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7 The Honorable Lauren King  
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14 UNITED STATES DISTRICT COURT FOR THE  
15 WESTERN DISTRICT OF WASHINGTON  
16 AT SEATTLE  
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19 UNITED STATES OF AMERICA,  
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21 Plaintiff,  
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24

25 v.  
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27 CONNOR RILEY MOUCKA,  
28 a.k.a. "Alexander Antonin Moucka,"  
29 a.k.a. "judische,"  
30 a.k.a. "catist,"  
31 a.k.a. "waifu,"  
32 a.k.a. "ellyel8,"  
33  
34 and  
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36 JOHN ERIN BINNS,  
37 a.k.a. "irdev,"  
38 a.k.a. "j\_irdev1337,"  
39  
40 Defendants.  
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42 NO. CR24-180 LK  
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48 GOVERNMENT'S MOTION FOR  
49 ALTERNATIVE VICTIM  
50 NOTIFICATION  
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53 Noting Date: July 21, 2025  
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1 because the number of crime victims in this case makes it impracticable to accord all of  
 2 the crime victims the rights described in subsection 3771(a).

3 **The Crime Victims Right Act**

4 The Crimes Victims' Rights Act ("the Act"), codified at Title 18, United States  
 5 Code, Section 3771, provides certain rights to victims in federal criminal proceedings.  
 6 Among the rights the Act affords to crime victims are the rights to "reasonable, accurate,  
 7 and timely notice" of public court proceedings and to be "reasonably heard at any public  
 8 proceeding in the district court involving release, plea, sentencing, or any parole  
 9 proceeding." 18 U.S.C. § 3771(a).

10 The Act requires "[o]fficers and employees of the Department of Justice and other  
 11 departments and agencies of the United States engaged in the detection, investigation, or  
 12 prosecution of crime shall make their best efforts to see that crime victims are notified of,  
 13 and accorded, the rights described in subsection [3771](a)." 18 U.S.C. § 3771(c)(1).  
 14 Courts must also "ensure that the crime victim is afforded" those rights. 18 U.S.C.  
 15 § 3771(b). The Act defines a crime victim as "a person directly and proximately harmed  
 16 as a result of the commission of a Federal offense . . ." 18 U.S.C. § 3771(e).

17 Importantly, the Act recognizes that for crimes involving multiple victims, the  
 18 Court has discretion to adopt procedures to accord victim rights without unduly  
 19 interfering with the criminal proceedings. Where a court "finds that the number of crime  
 20 victims makes it impracticable to accord all of the crime victims the rights" described in  
 21 Section 3771(a), a court "shall fashion a reasonable procedure to give effect to this  
 22 chapter that does not unduly complicate or prolong the proceedings." 18 U.S.C.  
 23 § 3771(d)(2). The Act places no limitations on the alternative procedures which a Court  
 24 may fashion other than that the procedures be reasonable to effectuate the Act and that  
 25 they not unduly complicate or prolong the proceedings. *Id.*

## Defendants' Schemes Have Harmed a Large Number of Victims

2 The Indictment charges the defendants, Connor Riley Moucka and John Erin  
3 Binns, with conspiracy, computer fraud and abuse, extortion in relation to computer  
4 fraud, wire fraud, and aggravated identity theft, for their roles in international computer  
5 hacking and wire fraud schemes. As alleged in the Indictment, the defendants hacked into  
6 at least 10 victim organizations' protected computer systems, stole billions of sensitive  
7 customer records, threatened to leak the stolen data unless the victims paid ransoms, and  
8 offered to sell online the stolen data. The investigation to date has further revealed that  
9 closer to 165 companies were likely compromised through this series of breaches,  
10 spanning major industries, including telecommunications, banking, and healthcare.

11 The confirmed breaches resulted in terabytes of highly sensitive data belonging to  
12 over 100 million individuals being stolen by the defendants, including non-content call  
13 and text history records, banking and other financial information, payroll records,  
14 medical prescriber information, driver's license numbers, passport numbers, Social  
15 Security numbers, and other personally identifiable information. For example, co-  
16 conspirators transferred or caused to be transferred over 10 gigabytes of Victim-3's stolen  
17 data, to include names, email addresses, residential addresses, dates of birth, and gift card  
18 numbers belonging to millions of Victim-3's customers.

## 19 The Court Should Approve the Government's Alternative Victim Notification Plan

20 The United States is committed to providing victims with every reasonable  
21 opportunity to express their views to the Court. It is vitally important to the integrity of  
22 the prosecution process that victims know that their losses and the impact of the offense  
23 conduct are fairly considered by the Court in reaching a just resolution and a fair  
24 sentencing in this case. But the large number of victims make compliance with the  
25 notification requirements outlined in section 3771(a), (b) and (c) impracticable. Neither  
26 the government nor the Court has the resources to accord all of the victims in this case  
27 the notice required by subsection 3771(a).

1 Due to the multitude of victims in this case, the government proposes to notify  
 2 victims through the Justice Department's website for large cases,  
 3 <https://justice.gov/largecases>, which will host a case-specific webpage for individuals  
 4 who are victims or who believe that they may be victims. The case-specific website will  
 5 also contain the notices required under the Act and provide potential victims the  
 6 opportunity to complete a victim impact statement to relay information about how they  
 7 were victimized, thereby putting the United States in a better position to communicate  
 8 directly and individually with potential victims.

9 Courts, including in this District, have approved similar requests. *See, e.g., United*  
 10 *States v. Braga*, CR22-169 TL, Dkt. 34 (W.D. Wash. April 2, 2025) (granting motion to  
 11 permit victim notification via Justice Department's large case website in prosecution of  
 12 Ponzi scheme in which thousands of investors lost money); *United States v. Potapenko &*  
 13 *Turōgin*, CR22-185 RSL, Dkt. 109 (W.D. Wash. July 18, 2024) (granting opposed  
 14 motion to permit victim notification via Justice Department's large case website in  
 15 prosecution of conspiracy, wire fraud, and money laundering conspiracy in which  
 16 defendants induced at least hundreds of thousands of investors to transfer hundreds of  
 17 millions of dollars to defendants' companies); *United States v. Ginster*, CR22-374 JSC,  
 18 Dkt. 40 (N.D. Cal. Oct. 11, 2022) (authorizing the use of government's websites for large  
 19 cases to provide notice to thousands of potential victims of cryptocurrency fraud  
 20 scheme); *United States v. Turchin*, CR18-303 RAJ, Dkt. 10 (W.D. Wash. July 7, 2020)  
 21 (authorizing use of Justice Department's large case website in computer intrusion  
 22 prosecution involving hundreds of protected computer networks); and *United States v.*  
 23 *Iarmak*, CR19-257 RSM, Dkt. 18 (W.D. Wash. May 14, 2020) (granting motion to permit  
 24 victim notification via Justice Department's large case website in prosecution of malware  
 25 scheme that attacked over 100 companies in the United States).

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## CONCLUSION

Based on the foregoing, the government requests the Court grant the motion for alternative victim notification procedures.

DATED this 9th day of July, 2025.

Respectfully submitted,

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I certify that this memorandum contains 1,009 words, in compliance with the Local Criminal Rules.